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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

PAUL MONPLAISIR, on behalf of himself and  
all others similarly situated,

Plaintiffs,

vs.

INTEGRATED TECH GROUP, LLC and  
ITG COMMUNICATIONS LLC,

Defendants.

Case No.: 3:19-cv-01484-WHA

**DECLARATION OF MICHELLE S. LIM  
IN SUPPORT OF PLAINTIFF'S MOTION  
FOR CLASS CERTIFICATION**

Date: February 6, 2020  
Time: 8:00 a.m.  
Ctroom: 12, 19th Floor

Judge: Hon. William Alsup

Complaint Filed: March 21, 2019  
Trial Date: October 19, 2020

**DECLARATION OF MICHELLE S. LIM**  
**IN SUPPORT OF MOTION FOR CLASS CERTIFICATION**

I, Michelle S. Lim, declare as follows:

1. I am an attorney at law duly licensed and in good standing to practice law in the courts of California (No. 315691) and am admitted to practice law before this Court, the United States District Court Northern District of California. I am an associate attorney at the law firm of Schneider Wallace Cottrell Konecky Wotkyns LLP, counsel for Plaintiff Paul Monplaisir, individually and on behalf of all others similarly situated, (“Plaintiff”) in this action.

2. This Declaration is submitted in support of Plaintiff’s Motion for Class Certification. I have personal knowledge of the facts set forth in this Declaration and, if called upon as a witness, I could and would testify competently as to these facts.

3. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts from the deposition transcript of Defendants’ Rule 30(b)(6) witness, Elizabeth Smith, taken November 4, 2019.

4. Attached hereto as **Exhibit B** is a true and correct copy of relevant excerpts from the deposition transcript of Defendants’ Rule 30(b)(6) witness, Gissel Rivera, taken November 7, 2019.

5. Attached hereto as **Exhibit C** is a true and correct copy of relevant excerpts from the deposition transcript of Defendants’ Rule 30(b)(6) witness, Katie Tisdale, taken November 5, 2019.

6. Attached hereto as **Exhibit D** is a true and correct copy of relevant excerpts from the deposition transcript of Defendants’ Rule 30(b)(6) witness, Jerry Taylor, taken November 6, 2019.

7. Attached hereto as **Exhibit E** is a true and correct copy of relevant excerpts from the rough deposition transcript of Defendants’ Rule 30(b)(6) witness, Jerry Taylor, taken December 10, 2019.

8. Attached hereto as **Exhibit F** is a true and correct copy of a document produced by Defendants, entitled “ITG Communications,” bates-stamped ITG\_000176-ITG\_000178, and introduced as Exhibit 11 in the deposition of Defendants’ Rule 30(b)(6) witness, Katie Tisdale, taken November 5, 2019.

1           9.       Attached hereto as **Exhibit G** is a true and correct copy of a document produced by  
2 Defendants, entitled “Meal Periods and Start/End Time Memo,” bates-stamped ITG\_000171-ITG-  
3 000172, dated October 26, 2018, and introduced as Exhibit 13 in the deposition of Defendants’  
4 Rule 30(b)(6) witness, Katie Tisdale, taken November 5, 2019.

5           10.      Attached hereto as **Exhibit H** is a true and correct copy of a document produced by  
6 Defendants, entitled “Start/End Time Memo,” bates-stamped ITG\_000173, dated November 28,  
7 2018, and introduced as Exhibit 18 in the deposition of Defendants’ Rule 30(b)(6) witness, Katie  
8 Tisdale, taken November 5, 2019.

9           11.      Attached hereto as **Exhibit I** is a true and correct copy of a relevant excerpt from a  
10 document produced by Defendants, entitled “Work Order Completion Bonus,” bates-stamped  
11 ITG\_000149, and introduced as Exhibit 12 in the depositions of Defendants’ Rule 30(b)(6)  
12 witnesses, Katie Tisdale and Gissel Rivera, taken November 5, 2019 and November 7, 2019,  
13 respectively.

14           12.      Attached hereto as **Exhibit J** is a true and correct copy of relevant excerpts from a  
15 Powerpoint document labeled as ITG\_000011 and produced by Defendants, entitled “ITG  
16 Communications LLC New Hire Orientation,” dated November 2017, and introduced as Exhibit 6  
17 in the deposition of Defendants’ Rule 30(b)(6) witness, Katie Tisdale, taken November 5, 2019.

18           13.      Attached hereto as **Exhibit K** is a true and correct copy of relevant excerpts from a  
19 document produced by Defendants, entitled “Employee Policy Manual,” bates-stamped  
20 ITG\_000042-ITG\_000084, and introduced as Exhibit 14 in the deposition of Defendants’ Rule  
21 30(b)(6) witness, Katie Tisdale, taken November 5, 2019.

22           14.      Attached hereto as **Exhibit L** is a true and correct copy of relevant excerpts from a  
23 document produced by Defendants, entitled “Employee Handbook,” bates-stamped ITG\_000180-  
24 ITG\_000228, dated July 2019, and introduced as Exhibit 20 in the deposition of Defendants’ Rule  
25 30(b)(6) witness, Katie Tisdale, taken November 5, 2019.

26           15.      Attached hereto as **Exhibit M** is a true and correct copy of relevant excerpts from a  
27 document produced by Defendants, entitled “2016 Employee Policy Reminder,” bates-stamped  
28

1 ITG\_000131-ITG\_000141, dated January 19, 2015, and introduced as Exhibit 15 in the depositions  
2 of Defendants' Rule 30(b)(6) witnesses, Katie Tisdale and Gissel Rivera, taken November 5, 2019  
3 and November 7, 2019, respectively.

4 16. Attached hereto as **Exhibit N** is a true and correct copy of a document produced by  
5 Defendants, entitled "Timekeeping Memo," bates-stamped ITG\_000129-000130, dated August 26,  
6 2016, and introduced as Exhibit 16 in the deposition of Defendants' Rule 30(b)(6) witness, Katie  
7 Tisdale, taken November 5, 2019.

8 17. Attached hereto as **Exhibit O** is a true and correct copy of the declaration of putative  
9 Class member and named Plaintiff Paul Monplaisir, executed on December 19, 2019, provided in  
10 support of Plaintiff's Motion for Class Certification.

11 18. Attached hereto as **Exhibit P** is a true and correct copy of the declaration of putative  
12 Class member Michael Alberto, executed on December 18, 2019.

13 19. Attached hereto as **Exhibit Q** is a true and correct copy of the declaration of putative  
14 Class member Junior Prophete, executed on December 18, 2019.

15 20. Attached hereto as **Exhibit R** is a true and correct copy of the declaration of putative  
16 Class member Marc Cajuste, executed on December 18, 2019.

17 21. Attached hereto as **Exhibit S** is a true and correct copy of the declaration of putative  
18 Class member Emanex Jean, executed on December 18, 2019.

19 22. Attached hereto as **Exhibit T** is a true and correct copy of the declaration of putative  
20 Class member Jean Obilas, executed on December 18, 2019.

21 23. Attached hereto as **Exhibit U** is a true and correct copy of the declaration of putative  
22 Class member Macdonal St. Germain, executed on December 18, 2019.

23 24. Attached hereto as **Exhibit V** is a true and correct copy of the declaration of putative  
24 Class member Raphael Parris, executed on December 19, 2019.

25 25. Attached hereto as **Exhibit W** is a true and correct copy of the declaration of  
26 putative Class member James Mills, executed on December 19, 2019.

